

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:

**BRON MEDIA HOLDINGS USA CORP., et al.,**

**DEBTORS IN A FOREIGN  
PROCEEDING.**

**CHAPTER 15**

**CASE NO. 23-56798-PMB**

**JOINTLY ADMINISTERED**

**NOTICE OF FILING OF ORDER OF ATTACHMENT  
FOR CREDITOR HUDSON PRIVATE CORP.**

**PLEASE TAKE NOTICE** that **WV PARTNERS LLC A/K/A WEST VENTURES LLC** (“West Ventures”), a party in interest in the above-referenced jointly administered chapter 15 proceeding (this “Chapter 15 Proceeding”), hereby files a true and correct copy of the *Order of Attachment* (the “Order”) attached hereto as Exhibit “A”.

**PLEASE TAKE FURTHER NOTICE** that the Order was entered in the action styled *WV Partners LLC v. Hudson Private Corp.*, Index No. 654392/2023, in the Commercial Division of the Supreme Court of the State of New York, County of New York, on February 28, 2024.

**PLEASE TAKE FURTHER NOTICE** that:

1. The Order was granted pursuant to section 6201(3) of the New York Civil Practice Law and Rules (“NY CPLR”) against **HUDSON PRIVATE CORP**, a creditor and party in interest in this Chapter 15 Proceeding.
2. The amount secured by the Order, including any interest, shall be for the sum of \$14,144,154.10 as of August 31, 2023, plus unpaid interest thereon (the “Funds”), costs, and sheriff’s fees and expenses.

3. The Order provides that all persons served with this Order shall be and hereby are forbidden to make or suffer any sale, assignment or transfer of, or any interference with the Funds, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to a court order.
4. The Order provides that all garnishees upon whom a copy of this Order is served are directed to serve the statement required by section 6219 of the NY CPLR, by hand or overnight delivery upon the sheriff and counsel for West Ventures, Robert Kirshenberg, Esq., One Vanderbilt Avenue, New York, NY 10017, within five (5) days after levy.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Order, **YOU ARE FORBIDDEN** to make or suffer any sale, assignment or transfer of, or any interference with the Funds, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to a court order.

Dated: March 18, 2024

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ Alison Elko Franklin  
Alison Elko Franklin  
Georgia Bar No. 243353  
3333 Piedmont Road, NE, Suite 2500  
Atlanta, Georgia 30305  
Telephone: (678) 553-2100  
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*Counsel for WV Partners LLC  
a/k/a West Ventures LLC*

**EXHIBIT “A”**

At I.A.S. Part 53 of the Supreme Court of the State of New York, held in and for the County of New York, at the County Courthouse thereof, located at 60 Centre Street, New York, NY, on the 28 day of February, 2024

Present: Hon. Andrew Borrok  
J.S.C

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION

-----X  
WV PARTNERS LLC,

Plaintiff, : Index No. 654392/2023

- against -

HUDSON PRIVATE  
CORP.,

-----  
**ORDER TO SHOW CAUSE  
PURSUANT TO NY CPLR §§  
6301, 6311 OR IN THE  
ALTERNATIVE 6201(3)**

Defendant.

-----X  
UPON READING AND FILING of the Affirmation of Miriam G. Bahcall, dated February 22, 2024, the Affirmation of Craig Phares, dated February 21, 2024, together with the exhibits annexed thereto, Plaintiff WV Partners LLC's ("Plaintiff") Memorandum of Law of in Support its Order to Show Cause Seeking an Injunction or in the Alternative an Order of Attachment, dated February 22, 2024, and upon all the pleadings and proceedings heretofore had herein,

AND it being alleged that:

1. A cause of action for a money judgment exists in favor of Plaintiff against Defendant Hudson Private Corp. ("Hudson") for the principal sum of \$14,144,154.10 as of August 31, 2023, plus unpaid interest thereon,
2. Plaintiff is entitled to recover that sum exceeding all counterclaims known to it;

3. It is likely that Plaintiff will succeed on the merits and will suffer irreparable harm absent interim relief; and/or

4. Hudson, with intent to defraud its creditors or frustrate the enforcement of a judgment that is likely to be rendered in Plaintiff's favor, has assigned, disposed of, encumbered or secreted property, or removed it from the state, or is about to do any of these acts.

**LET Defendant Hudson SHOW CAUSE** at a hearing before this Court, at IAS Part 53, Room 238, of this Court located at 60 Centre Street, New York, NY, on the 2<sup>nd</sup> day of April, 2024 at 9:30 am/pm or as soon thereafter as counsel can be heard, by Zoom or in person, why an Order should not be entered pursuant to Articles 62, 63, and 32 of the Civil Practice Law and Rules ("CPLR"):

1. Granting a preliminary injunction:

- a. Requiring Hudson and its officers, agents, attorneys and employees to pay to Plaintiff, within three (3) business day of the date of this Order all proceeds, monies or funds ("Proceeds"), not previously transferred to Plaintiff, received or collected on account of, related to, pursuant to, or in connection with any of the following: (i) the motion picture productions entitled: "Bombshell" and/or "Ghostbusters: Afterlife", (ii) the Settlement Agreement dated July 8, 2022 between Hudson, Plaintiff and Bron Creative USA, Corp. ("Settlement Agreement"), and/or (iii) the enforcement of Affidavit in Support of Confession of Judgment ("Confession of Judgment") executed by Bron Creative simultaneously with the Settlement Agreement, and/or any judgment entered pursuant to the Confession of Judgment;
- b. Enjoining Hudson and its officers, agents, attorneys and employees from dissipating, transferring, encumbering, conveying, removing or disposing any Proceeds, including any additional Proceeds received or collected after the entry of this Order; and
- c. Requiring Hudson and its officers, agents, attorneys and employees to pay any additional Proceeds to Plaintiff within three (3) business days of receipt; and

d. Directing Hudson to provide, within three (3) business day of the date of this Order, a sworn accounting of all Proceeds received or collected to date, specifying the amount, the date received or collected, and current location of the Proceeds.

2. Granting an Order of Attachment:

a. Securing monies owed to Plaintiff for the sum of \$14,144,154.10 as of August 31, 2023, plus unpaid interest thereon (the "Funds");

b. Directing deposit of the Funds into the Court; and

3. Granting such other and further relief that the Court deems just and proper, including the costs and attorneys' fees incurred in asserting this action.

**IT IS HEREBY ORDERED** that, pending the issuance of a final judgment in this action, Defendant Hudson and its officers, agents, attorneys and employees are directed to pay to Plaintiff, within three (3) business day of the date of this Order, all Proceeds received or collected by Hudson and not previously transferred to Plaintiff; and it is further

**ORDERED** that, pending the issuance of a final judgment in this action, Defendant Hudson and its officers, agents, attorneys and employees are enjoined and prohibited from dissipating, transferring, encumbering, conveying, removing or disposing any Proceeds, including but not limited to any additional Proceeds received or collected after the entry of this Order; and it is further

**ORDERED** that, pending the issuance of a final judgment in this action, Hudson and its officers, agents, attorneys and employees are directed to (i) pay to Plaintiff, within three (3) business days of receipt any and all additional Proceeds received or collected, and (ii) notify Plaintiff and its counsel of receipt of any additional Proceeds within three (3) business days of receipt; and it is further →

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**ORDERED** that, Hudson shall provide, within three (3) business day of the date of this Order, a sworn accounting of all Proceeds received and/or collected to date, specifying the amount,

the date each amount was received or collected, and current location of the Proceeds; and it is further

**ORDERED**, that an Order of Attachment is hereby granted pursuant to CPLR § 6201(3); and it is further

**ORDERED**, that the amount to be secured by this Order, including any interest, shall be for the sum of \$14,144,154.10 as of August 31, 2023, plus unpaid interest thereon, costs, and sheriff's fees and expenses; and it is further

**ORDERED** that, sufficient reason having been shown therefor, pending the issuance of a final judgment in this action, Defendant Hudson shall deposit the Funds into the Court pursuant to CPLR § 2601; and it is further,

**ORDERED**, that all persons served with this Order shall be and hereby are forbidden to make or suffer any sale, assignment or transfer of, or any interference with the Funds, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to a court order; and it is further

**ORDERED**, that all garnishees upon whom a copy of this Order is served are directed to serve the statement required by CPLR § 6219, by hand or overnight delivery upon the sheriff and Robert Kirshenberg, located at One Vanderbilt Avenue, New York, NY 10017, counsel for Plaintiff, within five days after levy; and it is further

**ORDERED** that personal or overnight service of a copy of this Order to Show Cause and the papers upon which it is based, upon either defendant or its counsel, on or before \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon, \_\_\_\_\_, \_\_\_\_\_, shall be deemed good and sufficient service thereof; and it is further

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Am

Ma farr accepted service on 10/24/24. (Am)

**ORDERED**, that service of a copy of this Order Defendant Hudson by E-filing or overnight service, together with the papers upon which it is granted, on or before \_\_\_\_\_, be deemed good and sufficient service thereof. Opposition papers, if any, shall be served by upon counsel for the Plaintiff, Robert Kirshenberg, located at One Vanderbilt Avenue, New York, NY 10017, so as to be received by 5 a.m./p.m. on or before March 22, 2024.

Dated: New York, New York  
2/28, 2024      *Ordered, that Plaintiff shall post an undertaking in the amount of \$,000 in support of the attachment by March 22, 2024 QJm.*

**E N T E R:**

  
\_\_\_\_\_  
J.S.C.

**HON. ANDREW BORROK**  
J.S.C.

**CERTIFICATE OF SERVICE**

This is to certify that I have on this day electronically filed the foregoing *Notice of Filing of Order of Attachment for Creditor Hudson Private Corp.* using the Court's CM/ECF System, which serves the same upon all participants therein who have appeared in this case:

- **Bryan E. Bates** [bbates@phrd.com](mailto:bbates@phrd.com)
- **Kennedy Bodnarek** [kbodnarek@phrd.com](mailto:kbodnarek@phrd.com)
- **Brian P. Hall** [bhall@sgrlaw.com](mailto:bhall@sgrlaw.com); [sgr.notifications@gmail.com](mailto:sgr.notifications@gmail.com)
- **Michael F. Holbein** [mholbein@sgrlaw.com](mailto:mholbein@sgrlaw.com)
- **Walter E. Jones** [wjones@balch.com](mailto:wjones@balch.com); [fednoticesatl@balch.com](mailto:fednoticesatl@balch.com)
- **David B. Kurzweil** [kurzweild@gtlaw.com](mailto:kurzweild@gtlaw.com); [brattons@gtlaw.com](mailto:brattons@gtlaw.com)
- **Louis G. McBryan** [lmcryan@mcbryanlaw.com](mailto:lmcryan@mcbryanlaw.com); [alepage@mcbryanlaw.com](mailto:alepage@mcbryanlaw.com)
- **Cameron M. McCord** [cmccord@joneswalden.com](mailto:cmccord@joneswalden.com); [jwdistribution@joneswalden.com](mailto:jwdistribution@joneswalden.com); [ljones@joneswalden.com](mailto:ljones@joneswalden.com); [cparker@joneswalden.com](mailto:cparker@joneswalden.com); [lpineyro@joneswalden.com](mailto:lpineyro@joneswalden.com)
- **Office of the United States Trustee** [ustpregion21.at.ecf@usdoj.gov](mailto:ustpregion21.at.ecf@usdoj.gov)
- **Matthew Petrie** [petriem@gtlaw.com](mailto:petriem@gtlaw.com)
- **Patrick Sillaway** [psillaway@balch.com](mailto:psillaway@balch.com); [ddaley@balch.com](mailto:ddaley@balch.com)
- **J. Nevin Smith** [tpauley@smithconerly.com](mailto:tpauley@smithconerly.com); [jsmith@smithconerly.com](mailto:jsmith@smithconerly.com); [R40523@notify.bestcase.com](mailto:R40523@notify.bestcase.com)

I further certify that on the date indicated below, I caused true and correct copies of the foregoing *Notice of Filing of Order of Attachment for Creditor Hudson Private Corp.* to be served upon the parties listed below via e-mail:

- **Aaron Gilbert** [agilbert@bronstudios.com](mailto:agilbert@bronstudios.com)
- **Asim Iqbal** [aiqbal@millerthomson.com](mailto:aiqbal@millerthomson.com)
- **Bryan Hicks** [bjhicks@millerthomson.com](mailto:bjhicks@millerthomson.com)
- **Monica Faheim** [mfaheim@millerthomson.com](mailto:mfaheim@millerthomson.com)

- **Mark Wentzell** [Mark.Wentzell@ca.gt.com](mailto:Mark.Wentzell@ca.gt.com)
- **James Saxton** [james.saxton@ca.gt.com](mailto:james.saxton@ca.gt.com)
- **Eric Jamieson** [Eric.Jamieson@ca.gt.com](mailto:Eric.Jamieson@ca.gt.com)
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- **Debbie H. Patrick** [bpatrick@sde.bz](mailto:bpatrick@sde.bz)
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- **Lorna Badeo** [lbadeo@dga.org](mailto:lbadeo@dga.org)
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- **Kevin Fritz** [kaf@msf-law.com](mailto:kaf@msf-law.com)
- **Peter Rubin** [peter.rubin@blakes.com](mailto:peter.rubin@blakes.com)
- **John Salmas** [john.salmas@dentons.com](mailto:john.salmas@dentons.com)
- **David F. Staber** [dstaber@akingump.com](mailto:dstaber@akingump.com)

I further certify that on the date indicated below, I caused true and correct copies of the foregoing *Notice of Filing of Order of Attachment for Creditor Hudson Private Corp.* to be served upon the parties listed below via U.S. First Class Mail and First Class International Mail with adequate postage prepaid:

Sara L. Chernetz  
Perkins Coie LLP  
1888 Century Park East  
Suite 1700  
Los Angeles, CA 90067

BRON Media Holdings USA  
Corp.  
1700-Park Place, 666 Burrard  
Street  
Vancouver, BC V6C 2X8  
Canada

BRON Life USA Inc.  
1700-Park Place, 666 Burrard  
Street  
Vancouver, BC V6C 2X8  
Canada

Jonathan Shenson  
Greenberg Glusker LLP  
2049 Century Park East  
Suite 2600  
Los Angeles, CA 90067

BRON Creative USA, Corp.  
1700-Park Place, 666 Burrard  
Street  
Vancouver, British Columbia  
Canada

BRON Releasing USA Inc.  
1700-Park Place, 666 Burrard  
Street  
Vancouver, BC V6C 2X8  
Canada

BRON GROUP OF  
COMPANIES  
5542 Short Street  
Burnaby, BC V5J 1L9  
Canada

BRON Digital USA, LLC  
1700-Park Place, 666 Burrard  
Street  
Vancouver, BC V6C 2X8  
Canada

BRON Studios USA Inc.  
1700-Park Place, 666 Burrard  
Street  
Vancouver, BC V6C 2X8  
Canada

BRON Studios USA Developments Inc. 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	BRON Ventures 1, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Bakhorma, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada
Drunk Parents, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Fables Holdings USA, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Fables Productions USA Inc 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada
Gossamer Holdings USA, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Gossamer Productions USA Inc. 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Harry Haft Productions, Inc. 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada
Heavyweight Holdings, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	I Am Pink Productions, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Lucite Desk, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada
National Anthem Holdings, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	National Anthem ProdCo Inc. 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Oakland Pictures Holdings, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada
Pathway Productions, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Robin Hood Digital PC USA Inc. 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Robin Hood Digital USA, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada
Solitary Holdings USA, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Surrounded Holdings USA LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada	Welcome To Me, LLC 1700-Park Place, 666 Burrard Street Vancouver, BC V6C 2X8 Canada
Creative Wealth Media Lending LP 2016 c/o Creative Wealth Media GenPar Ltd. 151 Bloor Street West, Suite 700 Toronto, ON M5S 1S4 Canada Attn: Richard McConnell	Bennett Jones LLP 3400 One First Canadian Place P.O. Box 130 Toronto, ON M5X 1A4 Canada Attn: Peter Dunne, Mike Shakra, and Joshua Foster	Bennett Jones LLP 666 Burrard Street, Suite 2500 Vancouver, BC V6C 2X8 Canada

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Canada  
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Cassels Brock & Blackwell LLP  
Suite 2200, HSBC Building  
885 West Georgia Street  
Vancouver, BC V6C 3E8  
Canada  
Attn: John Birch

Dated: March 18, 2024

/s/ Alison Elko Franklin  
Alison Elko Franklin